

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**SUPPLEMENTAL AFFIDAVIT OF BATES WHITE, LLC
REGARDING RATE INCREASES FOR CERTAIN TIMEKEEPERS**

I, Scott Lobel, being of full age, certify as follows:

1. I am a partner at Bates White, LLC ("Bates White") which maintains offices at 2001 K Street NW, North Building, Suite 500, Washington, DC 20006. I am duly authorized to make this certification on behalf of Bates White.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

2. On May 4, 2023, LTL Management LLC, the above-captioned debtor (the “Debtor”) filed an application for the retention of Bates White as its talc consultants [Dkt. 421] (the “Retention Application”). In support of the Retention Application, Bates White filed the Certification of Charles H. Mullin, PhD (the “Mullin Certification”) [Dkt. 421-2]. On June 5, 2023, Bates White filed the Supplemental Certification of Charles H. Mullin, PhD [Dkt. 691] (the “Mullin Supplemental Certification”).

3. On June 7, 2023, the Court entered an order approving the Retention Application (“Retention Order”) [Dkt. 723].

4. Pursuant to the Retention Application and the Mullin Certification, “Bates White’s hourly billing rates are subject to periodic adjustments to reflect economic and other conditions and promotions; however, such rates may be adjusted only with the consent of the Debtor.” See Retention App. ¶ 4; Mullin Certification, 3.

5. In the ordinary course of Bates White’s business and in keeping with Bates White’s established billing practices and procedures, Bates White’s standard billing rates were adjusted for several employees who were promoted to more senior levels effective July 1, 2023. Pursuant to ¶ 6 of the Retention Order, Bates White submits this supplemental affidavit to “explain the basis for the rate increases in accordance with section 330 of the Bankruptcy Code.” Effective August 1, 2023, the standard hourly rates charged for these timekeepers are as follows:

Timekeeper	Initial Title	Current bill rate	Updated Title	Bill Rate as of August 1, 2023
Villani, Joseph H.	Consultant I	\$410	Consultant II	\$425
McBride, Hannah F.	Consultant I	\$410	Consultant II	\$425
Coleman, Nathan C.	Consultant II	\$465	Senior Consultant	\$480
Odio-Zuniga, Mariana	Economist	\$525	Senior Economist	\$550

I certify under penalty of perjury that the foregoing is true and correct.

Date: July 11, 2023
Washington, DC

/s/ Scott M. Lobel
Scott M. Lobel
Bates White, LLC
2001 K Street NW
North Building, Suite 500
Washington, DC 20006
Telephone: (202) 408-6110
Facsimile: (202) 408-7838